



SEMS DocID 621060



Biddeford Industrial Park  
Biddeford, Maine 04005  
Tel: 207-282-5911  
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November 21, 1984  
FMI-Lgl-84-0837

Mr. Richard P. Baker  
Department of Environmental Protection  
Division of Licensing and Enforcement  
Bureau of Oil and Hazardous Material Control  
State House Station 17  
Augusta, Maine 04333

Dear Mr. Baker:

Confirming our phone conversation of November 21, 1984, it is our understanding that the date for purposes of "accumulation" of hazardous waste in an approved and labeled hazardous waste container shall be the date on which waste is first placed into the container. This date will be recorded on the container label. This will constitute conformance with the EPA regulations and, accordingly, shall constitute a compliance with the applicable Department of Environmental Protection regulations.

It is also understood that the commencement of the ninety (90) day period in which FMI has to dispose of the waste shall commence when 200 kilograms of waste are placed in the container, or the date on which the container is filled, whichever first occurs. Further, it is recommended that a separate label be placed on the container which will record the date on which the 200 kilogram threshold is reached.

I have also enclosed a copy of Mr. Bergeron's letter dated October 19, 1984 written in response to your letter of August 31, 1984. Mr. Bergeron's letter requested clarification of the regulations concerning the accumulation date.

If my understanding as outlined above is incorrect, please advise. It is the intent of FMI to comply fully with the applicable regulations of the Department of Environmental Protection and Environmental Protection Agency.

Sincerely,

FIBER MATERIALS, INC.

David L. McEwing  
General Counsel

DLM/ka

Enclosure

cc: ☒ Dave Bergeron